

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

RAUL NOVOA, *et al.*,

Civil Action No. 5:17-cv-02514

Plaintiffs,

5 | v.

THE GEO GROUP, INC.

Defendant.

DECLARATION OF RAMON MANCIA

I, RAMON MANCIA, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so based on personal knowledge.

2. I am a citizen of El Salvador and have resided in the United States since I was ten years old.

3. I am a resident of Los Angeles, California, and I have longstanding family and community ties to the area.

4. I entered the Adelanto ICE Processing Center (the “Adelanto Facility”) as a civil immigration detainee in approximately April 2019 and am currently detained there.

5. Defendant The GEO Group, Inc. (“GEO”) issued me a “Detainee Handbook” when I entered the Adelanto Facility.

1 6. I learned about the Work Program upon my entry to the Adelanto Facility
2 and requested to take part in the program.

3 7. I currently work as a kitchen worker in the Work Program. As a food
4 service worker, I work with a crew of approximately a dozen other detainees to prepare
5 food, serve meals, and clean the kitchen and dining halls. I work during the lunch shift,
6 from approximately 9:00 a.m. until 3:00 p.m., up to seven days per week. My
7 understanding is that at least 20 detainees work in the kitchen during each breakfast and
8 dinner shift. I am paid \$1.00 per day for my labor in the kitchen.

9 8. I additionally work as a porter, but I am not paid for that work. Every day,
10 I collect trash and empty water jugs from each housing unit, and then refill and return
11 the water jugs. I work with a crew of two or three other detainees for approximately two
12 hours per day, up to seven days per week. I have never been compensated for my labor
13 as a porter. Instead, GEO officials occasionally give me extra food or milk. Sometimes
14 I receive nothing at all.

15 9. GEO supervises and controls all aspects of my work. GEO provides me
16 with the training, safety equipment, and tools I need to perform my jobs at the Adelanto
17 Facility. GEO required me to submit an application before I was hired as a kitchen
18 worker. GEO also required me to sign various documents when I first began that job.

19 10. GEO officials routinely require detainees to clean areas of the Adelanto
20 Facility for no compensation. On multiple occasions, GEO officials have told me to
21 complete work tasks in various areas of the Adelanto Facility. For example, GEO

1 officials have instructed me to paint a dining hall, clean the medical unit, and clean the
2 recreation yard. I have never been paid for that work. Instead, GEO officials
3 occasionally give me extra food, batteries, or clothing for my labor. Other times, I
4 receive nothing at all.

5 11. From my review of the Detainee Handbook, I understand that detainees
6 who disobey GEO officials or refuse to clean can be subject to disciplinary action,
7 including solitary confinement.

8 12. Because of my detainee status, GEO does not permit me to seek
9 employment from another employer outside the walls of the Adelanto Facility.

10 13. Regardless of how many hours I work in a day or week, GEO pays me
11 only \$1.00 per day, or nothing at all. I do not earn minimum wage for the work I perform
12 at the Adelanto Facility for GEO.

13 14. I participate in the Work Program in order to buy daily necessities that
14 GEO fails to provide for me, including food and personal hygiene items. I fear that if I
15 cannot afford purchases from commissary, I will not have access to those necessities.

16 15. To the best of my knowledge, hundreds of detainees, if not more, take part
17 in the Work Program. I believe that other detainees performed similar work assignments,
18 as well as jobs in the kitchen, laundry, barbershop, and other cleaning and maintenance
19 type jobs. I am not aware of any detainee receiving more than \$1.00 per day for
20 participating in the Work Program.

1 16. I understand that I bringing this case on behalf of all current and former
2 detainees at the Adelanto Facility, not just myself.

3 17. I understand the responsibilities involved in being both a plaintiff and a
4 class representative in this lawsuit. I am prepared to cooperate with my counsel and meet
5 all of my duties and obligations to make sure this lawsuit is pursued in the best interest
6 of myself and all other current and former participants in the Work Program at the
7 Adelanto Facility. I understand that means I may be required to have my deposition
8 taken by GEO's lawyers and respond to other discovery.

9 18. I am prepared to help prepare for and attend trial, to testify, and assist my
10 attorneys as needed and to continue to participate actively in the direction of this case.

11 I declare under penalty of perjury under the laws of the United States that the
12 foregoing is true and correct and based on my personal knowledge.

14 Executed in Adelanto, California, on August 14, 2019.



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Ramon Mancia, Plaintiff